

VictoriaVision, Inc.

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November 21, 1996

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, D.C. 20554

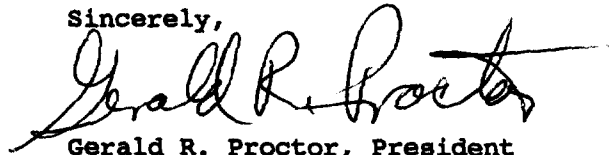
RE: Comments in Response to Sixth Further Notice of Proposed Rulemaking

Dear Mr. Caton:

Enclosed is an original and four copies of VictoriaVision's comments in the above cited Notice.

Should any question arise concerning these comments, I may be reached at the above listed address or telephone number.

Sincerely,



Gerald R. Proctor, President

GRP:cw

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast )  
Service )

Comments in response to  
Sixth Further Notice of Proposed Rule Making

Introduction

VictoriaVision, Inc. is the licensee of KVCT (TV), a small television station operating on Channel 19 in Victoria, Texas. The comments to follow were prepared without the benefit of counsel which doubtless shows. However, I believe the future of the industry I choose to call mine hangs in the balance and for me not to comment is unthinkable.

Comments

The Commission had, at one time, the opportunity to move all television to the UHF band. The Commission chose not to do so and there is, to this date, a "perceived -- if not real -- difference" between VHF and UHF. Because of this decision, television sets are more complex than necessary with tuner(s) which must recognize more than one band. To "intermix" the VHF and UHF bands requires two antennas, or a combined antenna with two coaxial feed lines. Reception of each band has its own set of problems which must be addressed. Had all NTSC television been moved to the UHF band years ago, perhaps we wouldn't be in the position of making, what I feel, is the same mistake twice.

An additional benefit to an all UHF DTV band will be the decreased cost of the television set and its antenna installation to the ultimate consumer -- our viewers. Anything which decreases that cost, by even a small amount, will speed the introduction of new DTV sets.

Further, the disparity between the transmitter power output required in a VHF DTV allocation vs. a UHF DTV allocation is astounding. Does this not continue to perpetuate the "perceived difference" between VHF and UHF?

Why is it necessary to retain the present "split" system? Certainly with the relinquishment of unused NTSC UHF channels and the elimination, or relaxation, of present UHF taboos, the new DTV allocations can certainly all be accomplished in the UHF band. But then I've been told DTV doesn't work well above channel 51. Does this mean there is a gradual "degradation" in DTV signal quality and/or coverage as we proceed from channel 14 through channel 51? If so, does this not create the potential for "war" between licensees as they scramble to acquire lower UHF channels?

In the latest information I have available, there are approximately 682 VHF licensees/permittees on twelve channels (57.8 stations per channel) and 862 UHF licensees/permittees on fifty-six channels (15.4 stations per channel). If 1544 new UHF DTV allocations (one for each licensee/permittee) are added to the present 862 UHF stations, a total of 2406 UHF allocations will be required (43.0 per channel). Utilizing only channels 14 through 61 results in 50.0 allocations per channel. If channels 14 through 51 are utilized, then there will be 63.3 allocations per channel. I realize this is grossly oversimplified but apparently DTV channels can be assigned immediately adjacent to existing NTSC operating stations and many of the present UHF "taboos" are gone, so why not? Further, when existing NTSC licenses are relinquished, additional spectrum will be available for new DTV stations. Right?

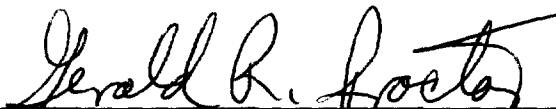
#### **Recommendations**

There are only two: Move all DTV allocations to the UHF band and expeditiously adopt the Grand Alliance technical standard!

To do so will allow for the utilization by other users of channels 2 through 13 immediately on a noninterfering "shared basis". Without access to the sophisticated computer program which generated the new proposed DTV table of allocations, I can't say with a certainty but it would appear that certainly the additionally displaced VHF channels 7 through 13 (7 channels) may be accommodated by the addition of UHF channels 52 through 61. This allows additional spectrum space (channels 62 through 69) to be made available immediately to other users on a noninterfering "shared basis".

The existing NTSC standard has served the industry well. Continuing improvements in signal quality have occurred even though standards haven't significantly changed for many years. This tells me that adoption of the Grand Alliance technical standard will allow for immediate implementation of DTV broadcasting but will not significantly hold back continuing technological development. Please adopt the Grand Alliance technical standard.

These comments and recommendations are respectfully submitted for your consideration this 21st day of November, 1996.

  
Gerald R. Proctor, President  
VictoriaVision, Inc.